



# Marketing, Communications and Fundraising Policy

November 2022

<b>Board Ratification Dates</b>	March 2021 October 2016	
<b>Revision Date Reaffirmation Date Next Review Date and Cycle</b>	November 2022	Altered Section 6.7 to confirm that at the time of acknowledging DFAT current DFAT guidance will be checked (in recognition that DFAT's guidance changes over time).
	March 2021	Revised and substantially shortened to reflect new FIA Code and other updated principles and standards; reformatted and made more concise to be consistent with Act for Peace Policies Policy.
	March 2024	Every three years from date of ratification or last full review or earlier if required.

## 1. Policy Statement

The purpose of Act for Peace's marketing, communication and fundraising activities is to empower passionate people, including Act for Peace's supporters and potential supporters, to give, fundraise and take action to fulfil Act for Peace's purpose. These important contributions can take the form of financial gifts, fundraising, volunteering, campaigning, and advocacy activities, and provide the funds Act for Peace requires to carry out its work and fulfil its mission.

These activities also recognise the important contribution that institutional donors, including the Australian Government, other international governments, multilateral agencies, NGOs, philanthropic institutions, and other entities make to achieve humanitarian and development outcomes.

Act for Peace recognises that:

- Supporter and institutional donor relationships build over time. Most support given to charities is not one-off, and the relationship between a charity and a supporter must be carefully nurtured and managed to maximise the support given to the charity over time.
- These relationships are based on trust. Ethical and sustainable fundraising, as well as being core to Act for Peace's values, is essential in order to enter into ongoing relationships of trust, confidence and mutual respect between Act for Peace and its institutional donors, supporters, volunteers, and beneficiaries.
- Fundraising costs money. Collecting stories, producing effective communications, reaching people, and building relationships requires an investment of time, energy, and money. When the return on investment from a fundraising activity is positive, the more that is invested in fundraising, the more money that is available for program work.
- Fundraising takes time. Because supporter and institutional donor relationships build over time, an investment in fundraising in one year may not deliver a positive return on investment for several years. Therefore, the 'fundraising ratio' of fundraising income vs expenditure in any given year is not a good indicator of the total return on investment of a fundraising activity. Lifetime value, or the fundraising income after costs over the entire time the supporter gives to the charity, is a more effective measure of return on investment.
- Maximising the net fundraising contribution to programs, not minimising the cost of fundraising, will most effectively help Act for Peace fulfil its purpose, its obligations to beneficiaries and its promise to donors. As an agency that is accountable to its donors, beneficiaries and other relevant stakeholders, Act for Peace must ensure that it maximises its net contribution to programs within a fundraising ratio that is acceptable to stakeholders.
- Fundraising activities must be relevant and appropriate to the needs of those Act for Peace seeks to assist. Accordingly, fundraising strategies must be aligned to Act for Peace's Strategic Plan and current or future Business or Operational Plans. Fundraising objectives and strategies, including the planned mix of earmarked and non-earmarked funding, must align supporter and institutional donor needs with the funding requirements of Act for Peace's humanitarian, protection, advocacy, and development programs.

Act for Peace seeks to ensure our supporters, donors and those who engage with us in fundraising and campaigning are treated ethically, with the highest level of respect and within the obligations we have accepted as a charitable organisation registered in Australia.

Compliance with this policy is essential to ensure Act for Peace can continue to generate and sustain the funding it requires for its work, protect its beneficiaries, supporters, staff, and volunteers, and manage organisational risk. It is also essential in order to enter into ongoing relationships of trust, confidence, mutual respect and accountability between Act for Peace and its institutional donors, supporters, volunteers, and beneficiaries.

## 2. Objective

The objective of this policy is to provide guidance to ensure Act for Peace staff, representatives and volunteers carry out marketing, communication and fundraising activities ethically, effectively, in line with Act for Peace's mission, vision, purpose and values, in compliance with all relevant Act for Peace policies, and meeting our obligations under Commonwealth, State and Territory legislation, as an ACT Alliance member, as a signatory to the ACFID Code of Conduct and the Fundraising Institute of Australia (FIA) Code, and as a recipient of funds from the Australian Government.

## 3. Principles and standards

As a member of ACFID, and a signatory to the ACFID Code of Conduct, Act for Peace is committed to meeting and exceeding the standards set out in the ACFID Code of Conduct and ACFID Fundraising Charter. Act for Peace will, on an annual basis, conduct the required self-assessment of its work against the Code and report on its compliance with the ACFID Fundraising Charter to its Board.<sup>1</sup>

Act for Peace is committed to high standards of ethical conduct in its fundraising and will adhere to the Fundraising Institute Australia (FIA) Code<sup>2</sup>. The Code is a voluntary, self-regulatory code of conduct, informed by the International Statement of Ethical Principles in Fundraising, that aims to raise standards of fundraising in Australia. Act for Peace will ensure that those engaged in fundraising activities have completed FIA Code training within six months of their appointment. An Act for Peace board member or its CEO will sign off annually on Act for Peace's adherence to the Code.

As a member of the ACT Alliance, Act for Peace is committed to upholding the standards set out in the ACT Alliance Branding Policy and Guidelines,<sup>3</sup> Communications Policy,<sup>4</sup> and Public Information Disclosure Policy.<sup>5</sup>

Act for Peace is committed to complying with the Australian Governments Department of Foreign Affairs and Trade (DFAT) Child Safeguarding Policy<sup>6</sup> and meeting its acknowledgement and publicity obligations under our DFAT Agreement and ANCP Grant Agreement, and other institutional donor requirements as confirmed in Agreements and associated policies. Compliance includes but is not limited to financial controls, dedicated use of funds, safeguarding, counterterrorism and other core compliance measures.

Act for Peace will also comply with all Federal, State and Municipal laws and regulations applicable to Fundraising; the Australian Privacy Principles; and Payment Card Industry Data Security Standards.

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<sup>1</sup> ACFID Code of Conduct, revised 1 January 2019: <https://acfid.asn.au/content/read-code>

ACFID Good Practice Toolkit: <https://acfid.asn.au/good-practice-toolkit/overview>

<sup>2</sup> FIA Code, updated 1 June 2018: <https://fia.org.au/wp-content/uploads/2019/05/CodeFINAL-2018.6.28-KW.pdf>

FIA Code Course Practice Notes: <https://fia.org.au/fia-code-course-practice-notes/>

<sup>3</sup> ACT Alliance Branding Policy and Guidelines: <https://actalliance.org/documents/act-branding-policy-and-guidelines/>

<sup>4</sup> ACT Alliance Communications Policy: <https://actalliance.org/documents/act-alliance-communications-policy/>

<sup>5</sup> ACT Alliance Public Information Disclosure Policy: <https://actalliance.org/documents/act-public-information-disclosure-policy/>

<sup>6</sup> DFAT Child Safeguarding Policy: <https://www.dfat.gov.au/sites/default/files/child-protection-policy.pdf>

DFAT Child Protection Guidance Notes: <https://www.dfat.gov.au/about-us/publications/pages/child-protection-policy>

This policy should be read in conjunction with Act for Peace's Value for Money Policy, Code of Conduct, Code of Good Practice, Child Safeguarding Policy, Risk Management Policy, Advocacy Policy, Counter-terrorism and Complaints Policy, as well as relevant Act for Peace operations manuals and procedures.

#### **4. Scope**

This policy applies to the production of all marketing, communications and fundraising materials, and any associated activities, undertaken by Act for Peace staff, representatives, suppliers, and volunteers whether in printed, electronic, or verbal form. Where specified, some sections of this policy also apply to Act for Peace's partners

#### **5. Policy in Action**

Act for Peace will ensure that all marketing, communications, and fundraising activities have clear objectives that align with its strategic goals, are effectively planned, and implemented to a high standard. Act for Peace will regularly monitor, evaluate, and learn from the progress of these activities, and adapt its approach to maximise their effectiveness.

Act for Peace's marketing, communications and fundraising strategies will be informed by evidence and best practice and benchmarked against past performance and the sector. Act for Peace will aim to maintain a balanced fundraising portfolio with a range of income streams and a diverse supporter and institutional donor base that balances risk and return.

Strategies for raising funds with institutional donors will be informed by research into institutional donor policy and funding preferences.

Strategies will aim to maximise the lifetime value of Act for Peace's supporter and institutional donor base at an acceptable return on investment, rather than minimising the cost of fundraising.<sup>7</sup> Act for Peace will strive to obtain an optimum balance between high productivity, effective outcomes, low cost, equitable distribution, and ethical practice.

Act for Peace's overall investment in marketing, communications, and fundraising, and therefore its fundraising ratio, will be approved by the Act for Peace Board during each strategic planning and budgeting cycle and reviewed annually by the Board as part of the budget approval process.

Act for Peace will put in place adequate procedures and record keeping to ensure it demonstrates compliance with this policy. These procedures will include compliance checklists that must be completed prior to the approval and distribution of marketing, communications, and fundraising content/material.

#### **6. Communications and Marketing activities**

Act for Peace's marketing, communications and fundraising activities will reflect its vision, purpose and values and adhere to the highest standards of ethics, transparency, accuracy, truthfulness, and integrity. Act for Peace will act openly, honestly, with respect for professional Fundraising and with regard to its responsibility for public trust. It will act with respect towards Donors and Beneficiaries, placing a high value on their privacy and confidentiality. Act for Peace will conduct itself in a manner that encourages others to aspire to the same high standards.

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<sup>7</sup> Responding to our Value for Money Policy

## 6.1. Transparency

Act for Peace will operate transparently with and be accountable to all stakeholders. It will be open about the work it does, including how funds are raised, managed, and disbursed. It will proactively share accurate, timely and accessible information about the organisation and its work, making this available to all stakeholders – its Australian constituency, overseas partners, and others (including primary stakeholders, partners, and donors). It also commits to seeking stakeholder inputs and feedback.

Act for Peace will regularly and proactively report back on its projects and activities, and the results of these activities and lessons learned. Information will be shared through its website, newsletters, promotional material, and the distribution of its Annual Report.

Its Annual Report will be produced in line with ACFID requirements and include ACFID Code-compliant financial statements and other detailed financial reports, including its overall expenditure on fundraising, and will be available to the public on its website. Act for Peace will lodge a copy of its audited annual report and a copy of its annual full financial statements (if not included in the annual report) with ACFID within the required reporting period. Act for Peace will also ensure that in any references to financial performance, stakeholders are made aware of their right to access Act for Peace's full financial reports. Act for Peace's website will also include publicly available information about the agency and its work, including its strategic plan, its governing Board and relevant policies and processes. Act for Peace will ensure its stakeholders are able to hold Act for Peace to account through maintaining key accountability documents on its website, including its *Code of Conduct*, *Code of Good Practice*, *Whistleblower* and *Complaints Policy* and procedures.

Act for Peace is committed to sharing any other information about its projects and activities (with the exception of confidential and commercially sensitive information) upon request, including:

- its objects and how it intends to use Donated funds.
- its capacity to use Donations effectively for their intended purposes.
- whether funds are being raised by volunteers, employees, or Suppliers.

## 6.2. Accuracy

Act for Peace's public materials will be truthful, accurately describe the organisation and its work, and not seek to deceive or mislead the general public.

Its marketing, communications and fundraising content will be obtained and used according to ethical principles, consistent with Act for Peace's purpose and values, and accurately describe the nature and scope of Act for Peace's work, acknowledging the role of partners.

Images and messages will accurately represent the context, situation, proposed solutions and intended meaning of information provided by affected people. They will avoid material omissions, exaggerations, or misleading visual portrayals. They will directly relate to the country, place, context, and activities being supported; and be an honest representation of the work being undertaken.

However, names and other information which could lead to the identification of, or location of vulnerable people featured in communications, or otherwise put their safety at risk, will be altered to ensure adequate protection.

Facts or statements will be checked for accuracy before publication.

When communicating about the work of ACT Alliance, or other coalitions or networks of which Act for Peace is a member, promotional materials will clearly distinguish between Act for Peace's work and that

of the alliance/network, where they are different. The material will not lead the public to believe that Act for Peace is undertaking work that is really being done by other parts of its international network. Fundraising communications will clearly state if there is a specific purpose of each donation, not overstate the need or what the donor's response may achieve, and not claim or imply that professional fundraising activities are carried out at no cost.

Act for Peace's financial statements will fully and accurately disclose administration costs and costs of any public fundraising. They will not inaccurately claim zero expenses or otherwise understate the amount spent on public fundraising and administration and/or overseas development expenditure. When reporting financial ratios, Act for Peace will apply ACFID's Financial Definitions in their calculations and accompany any use of ratios with a note explaining how these have been determined.

### **6.3. Integrity and ethics**

Act for Peace's marketing, communications and fundraising activities will be conducted with integrity, to the highest ethical standards. Act for Peace will not engage in activities that bring Fundraising into disrepute.

Images and messages in communications will:

- Promote partners and beneficiaries as active agents, and not as passive recipients of aid.
- Portray people (including children) in a manner that respects their dignity, values, history, religion, language, and culture.
- Be authentic to the context, person and terms of consent given.
- Protects the safety and rights of those depicted.
- Be respectful of other NGOs.

Images and messages in communications will not:

- Be discriminatory (e.g., on the basis of ethnicity, faith, sexuality, or socio-economic status).
- Sensationalise the challenges faced in developing countries.
- Be used if they may endanger the people they are portraying.
- Be used without the free, prior, and informed consent of the person/s portrayed, including children, their parents, or guardians.
- Present people in a dehumanised manner, or contain depictions that are demeaning, discriminatory, pornographic, or unduly violent towards a person or group.
- Infringe child safeguarding policies and in particular show children in a naked and/or sexualised manner.
- Comment unnecessarily or negatively on the impairment, dependency, or disability of a Beneficiary.
- Use language which suggests that the Beneficiary is to be pitied or feared.
- Use children to raise funds for adult causes, giving the impression that the Beneficiaries are childlike.
- Feature dead bodies or dying people.
- Disparage others.
- Infringe on the intellectual property rights of others.
- Denigrate other agencies, make statements about other NGOs with the intention of creating a reputational or other advantage for itself.

## 6.4. Supporters

Act for Peace will not exploit relationships with Supporters.

Act for Peace will promptly and courteously comply with a Supporter's:

- refusal to make a Donation.
- request to not receive any future solicitations.
- request to be contacted at a more convenient time or by a different method; and
- request to limit the number, type, or frequency of solicitations.

Act for Peace will, if asked:

- assist Supporters to stop receiving solicitations.
- provide information about how the Supporter's contact details were obtained; and
- provide information about how to make a complaint or the name and contact details of the person who is responsible for handling complaints.

Act for Peace will:

- not subject Supporters to undue influence, or any harassment, intimidation, or coercion.
- maintain an appropriate professional relationship with the Supporter in connection with any Donation or Bequest.
- not prevent or discourage a Supporter from seeking independent legal advice in relation to a Donation.
- not prevent or discourage a Supporter from having a family member or other trusted advisor present when considering a Donation.
- not, after obtaining a Donation, change the conditions of the Donation without first communicating with the Supporter any changes and gaining their consent for the change.
- Knowingly send communications to anyone under the age of 18.
- Ensure a Supporter has given consent prior to any public recognition of their Donation.

## 6.5. Branding and visual identity

A strong brand is an essential pre-requisite for attracting and maintaining public support for Act for Peace's work, and Act for Peace will achieve the greatest impact when all its communications build on and reinforce each other. All Act for Peace communications must follow the *Act for Peace Visual Identity Guidelines* to ensure all its communications convey a consistent brand personality and are instantly identifiable as coming from Act for Peace.

All Act for Peace communications must use the common visual identity system and feature the Act for Peace logo. In addition, Act for Peace has a co-branding requirement to always identify its relationship to the NCCA and as a member of the ACT Alliance. In very limited circumstances, where space does not allow for the effective use of all branding elements (such as social media icons or certain coalition publications), the Act for Peace logo may be used in isolation.

Act for Peace may also have additional co-branding obligations in certain circumstances, such as when needing to identify as a member of the Church Agencies Network, during activation of an Emergency Action Alliance appeal or when required by an institutional donor.

All Act for Peace products (such as the Christmas Bowl or the Act for Peace Ration Challenge) must be instantly recognisable as run by Act for Peace, and the best interest of the brand as a whole must always



take priority over what works best visually for an individual product or piece of communication.

Published URLs should always incorporate 'actforpeace' where possible (e.g. [www.actforpeace.org.au/productname](http://www.actforpeace.org.au/productname) or [productname.actforpeace.org.au](http://productname.actforpeace.org.au)). Where possible, all new products must be called, and referred to in marketing materials, as 'the Act for Peace *Product Name*' (e.g., the Act for Peace Ration Challenge) rather than given a stand-alone name.

## 6.6. Mandatories

Act for Peace's logo (which includes a statement relating to our purpose), mailing address, free call number, email address, website URL and ABN must be included on all Act for Peace communications (except in very limited circumstances, where space does not allow for the effective use of all mandatories above, such as videos, where the ABN and website URL only can be used).

## 6.7. Acknowledgement and attribution

Act for Peace commits to acknowledging and attributing the support of institutional donors, both in Australia and overseas.

Act for Peace will follow the branding requirements we agree to in our contracts with institutional donors to ensure they receive appropriate recognition, and to ensure our supporters and partners are aware of this contribution.

Correct and consistent branding maximises recognition of the development role played by the Australian Government. It is a key mechanism for enhancing the visibility of the Australian Government's international activities and initiatives.

In communication materials featuring programs funded by the Australian NGO Cooperation Program (ANCP), including – but not limited to – signage; publications; presentations; video clips, blogs, websites, and social media; and media releases, Act for Peace will follow the branding and acknowledgement guidelines provided by DFAT in the latest ANCP Manual. Act for Peace will also give verbal acknowledgement in speeches and interviews.

In branding aid and development activities delivered overseas with support from ANCP, Act for Peace will follow the branding and acknowledgement guidelines provided by DFAT in the latest ANCP Manual. The Act for Peace logo should also be used, together with other supporting organisations' logos, in accordance with the branding and acknowledgement guidelines provided in the latest ANCP Manual.

## 6.8. Privacy and data security

Privacy is very important to Act for Peace and it is committed to collecting, storing, and using personal, sensitive and credit card information responsibly.

All Act for Peace marketing, communication and fundraising activities must comply with Act for Peace's Privacy Policy and data handling procedures (which are guided by the Australian Privacy Principles) and PCI legislation.

Act for Peace will ensure that appropriate security measures (including encryption of internet transactions in accordance with industry standards) are in place to ensure that donations and supporter's information is secure at all times.

Act for Peace's Privacy Collection Notice must be clearly printed near to the point of data capture in all printed communications where data is collected and read out when data is collected over the phone. A link to Act for Peace's Privacy Policy must be displayed near to the point of data capture where data is collected online and in all direct-marketing emails from Act for Peace.

As stated in Act for Peace's Privacy Policy, supporters have the right to have their names deleted or suppressed from Act for Peace's mailing lists, and any mailing lists that it has shared. Supporters are also permitted to refuse to make a donation; limit to a certain amount, the frequency of communications (including fundraising solicitations); not be communicated with via mail, phone, or other technology; or not receive printed material concerning Act for Peace. Any such requests must be processed promptly by Act for Peace.

Each time a prospective supporter is contacted by Act for Peace, information must be provided about how the supporter can opt-out of receiving any further solicitations from Act for Peace. Prospective supporters are to be distinguished from existing supporters.

Supporter's personal information about their identity, their donations, and the organisations to whom they donate are protected and must not be disclosed to a third party without the consent of the supporter.

### **6.9 Media releases, media advisories and public statements**

Act for Peace engages with the media in order to raise awareness and inspire action on issues and activities relating to our purpose.

Act for Peace will only release statements in its own name and will not issue statements on behalf of the Member Churches of the NCCA.

All media releases, media advisories and public statements that include an Act for Peace policy position must be approved by the Act for Peace Chief Executive Officer or delegate. Once the policy position is approved, the CEO may delegate approval of related releases, advisories and statements to the Chief Marketing and Fundraising Officer and or Snr Policy and Advocacy Advisor or another delegate.

Media releases or public statements relating to institutional donor funded initiatives, including DFAT funded initiatives will acknowledge the donor's support. Media releases, articles or other formal statements prepared by Act for Peace relating to DFAT funded initiatives which expressly or impliedly comment adversely on DFAT's role in the initiative will be strictly subject to the prior written consent of DFAT. Act for Peace shall not associate the Commonwealth or DFAT in any way with any adverse comment it may make about governments in recipient countries; and as far as practical Act for Peace will keep DFAT, and the relevant Australian diplomatic mission advised of matters relating to public and media relations associated with DFAT funded initiatives.

### **6.9. Social media**

Social media networks are important two-way channels of communication between Act for Peace and its supporters, other stakeholders, and the general public. The interactive nature of these channels should be reflected in Act for Peace's social media communication strategies, and they should not be used as exclusively one-way or broadcast channels.

Act for Peace will appoint a person to review and moderate its social media channels/pages and ensure compliance with this policy, Act for Peace's Safeguarding Policies (including Child Safeguarding), Act for Peace's Privacy Policy, and other relevant Act for Peace policies.

Any new Act for Peace social media pages/accounts must be approved by the Act for Peace Chief Marketing and Fundraising Officer before being set up.

Information on Act for Peace's social media pages must be regularly updated, reviewed for accuracy and timeliness, and incorrect or outdated information removed.

Comments and posts by users should be moderated. Publicly posted feedback, queries, questions, or suggestions - positive and negative - should be responded to promptly. Moderation should be transparent, and negative feedback should only be removed if it is offensive or malicious. Offensive comments, links to offensive material or any post or comment that would endanger Act for Peace's staff, supporters, partners, or beneficiaries should be promptly removed. Complaints received via social media should be handled in accordance with Act for Peace's complaints handling procedures.

Advertising on social media channels must not be knowingly targeted at people under the age of 18, comply with Act for Peace's Privacy Policy, Safeguarding policies, Code of Conduct and all relevant legislation, including privacy legislation.

#### **6.10. Collection, storage and use of stories, photos, and video**

Act for Peace's story gathering guidelines must be followed when collecting, storing, and using stories, photos and videos of Act for Peace beneficiaries or supporters. This policy is designed to ensure Act for Peace always respects the dignity, values, history, religion, and culture of the people portrayed; ensure that the people portrayed, especially children, are protected and not endangered in any way; and ensure that our communications are factually accurate, truthful, and not likely to deceive or mislead any person.

Anyone photographing or filming a child or using children's images for Act for Peace-related purposes, must comply with *Act for Peace's Child Safeguarding Policy* and *Child-Safe Code of Conduct*, which describes Act for Peace obligations in full and mandatory requirements for staff.

Consent given by subjects to Act for Peace to use their images or stories must be free, prior, and informed and obtained in a way that is culturally appropriate and contextually sensitive. Key figures in images will be provided with information regarding how the image will be used and their permission obtained. They will have the right to deny either the taking of or use of their image without negative repercussion. The collection of information, images and stories must not harm people or the environment.

Origins of any images used will be known and any necessary permissions, including copyright releases, be held. Care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray.

These policy requirements apply to all information, stories and images collected for research, evaluation, and donor and supporter purposes.

##### *Collection*

A detailed story gathering brief, which includes Act for Peace's story gathering guidelines and permission requirements, must be prepared before each trip to the field and shared with the partner who is hosting the trip and arranging interviews with case studies. All people (staff, contractors, or volunteers) who undertake the collection of stories, photographs or video of Act for Peace beneficiaries are required to abide by local customs, observances, and traditions.

Key figures in images (and the child 'and' parent or guardian if the figure is a child) must provide 'informed consent' for the use of the image before images are captured. Details must be given as to how and where their image may be used. Evidence of this permission must be recorded in line with Act for Peace procedures, filed with the image(s) and kept on record until the image is destroyed.

### *Storage*

All Act for Peace images should be securely digitally stored (e.g., using a secure online image library) for use by Act for Peace staff in communications. Only images which are compliant with Act for Peace's image and child safeguarding guidelines must be uploaded, names of children and vulnerable adults (and anyone else on request) changed and any identifying information of children and vulnerable adults (and anyone else on request) including their location must be removed before being uploaded.

### *Use*

Images and video can only be used in accordance with Act for Peace's image and child safeguarding guidelines. Images should always be accompanied by a photo credit, and where possible, a descriptive caption. Editing checklists are used to ensure compliance with the guidelines.

## **7. Fundraising**

### **7.1. All fundraising communications**

Act for Peace is committed to adhering to best practice standards in fundraising and will comply with the ACFID Fundraising Charter and FIA Code. Specific fundraising activities will be guided by the relevant FIA Code Practice Notes, where applicable.

Act for Peace will abide by all applicable fundraising legislation, including the relevant provisions of the Competition and Consumer Act 2010 (Cth) and State or Territory equivalent legislation, (in particular those sections relating to misleading and deceptive conduct and false and misleading representations).

### **7.2. Use of funds**

Supporters will be informed about the purposes for which funds are being raised and be able to access information on programs supported by their donation.

Act for Peace's fundraising solicitations will clearly state if there is a specific purpose for the donations. In public fundraising for a specific purpose, Act for Peace will have a plan for handling any excess funds and make this known through the use of notifications presented near the point of donation.

Funds contributed by institutional donors will be used for the purpose set out in the signed agreement with the donor.

Act for Peace will maintain financial records that enable substantiation of application of supporter funds and will provide this on request.

After obtaining a donation, Act for Peace will not change the conditions of the donation without first communicating with the supporter any changes to the donation.

If a supporter requests their donation is used for a specific purpose other than a current, approved fundraising appeal, the decision will be handled in line with the policy on Acceptance and Refusal of Donations 7.4.

### **7.3. Fundraising for emergencies**

Act for Peace will follow Act for Peace’s Emergency Response Procedures when deciding whether or not to launch a fundraising appeal for a specific emergency and the scale of that appeal. Funding appeals may be aimed at supporters, the public and institutional donors.

Act for Peace will follow Act for Peace’s emergency fundraising guidelines when fundraising for emergency situations, which ensure we meet ACFID requirements for fundraising during emergencies.

If fundraising as part of an active Emergency Appeal Alliance (EAA) appeal, Act for Peace will meet its requirements for fundraising during an EAA activation.

A realistic fundraising target should be set, taking into account the needs of the program. Once the target is reached, Act for Peace must stop soliciting funds until the situation has been further assessed by the Act for Peace Emergency Response Management Team.

#### 7.4. Acceptance and refusal of donations

The purpose of the policy on Acceptance and Refusal of Donations is to give Act for Peace clear guidelines to make consistent decisions regarding the acceptance and refusal of a donation from a supporter or organisation. This policy clause does not apply to grants awarded by institutional donors for which Act for Peace has lodged an application. Act for Peace must ensure that decisions to accept or reject a donation support Act for Peace’s purpose and are in line with our Code of Good Practice.

The decision on whether to accept or refuse a donation must be taken by the Act for Peace Board, unless authority has been delegated as prescribed below:

All donations over \$500,000	Act for Peace Board
Donations between \$50,000 and \$500,000 where a) conditions are attached, e.g., the supporter has requested the donation is used for a specific purpose other than a current program or, approved fundraising activity; or b) the donation is from a company, institution, organisation, or high-profile individual	Act for Peace CEO
Donations below \$50,000 where conditions are attached, e.g., the supporter has requested the donation is used for a specific purpose other than a current program or, approved fundraising activity	Act for Peace Head of Programs and Partnerships

On the basis of the evidence available to them, the authorised decision maker must consider whether Act for Peace’s purpose will be best met by accepting or refusing the donation and decide accordingly. They must take into account Act for Peace’s legal obligations, any reputational risks to the agency and any potential adverse reaction from existing or potential supporters.

The authorised decision maker may accept a donation for a specific activity conducted by Act for Peace provided that that specific activity is:

- a) directly related to Act for Peace’s purpose; and
- b) is practically achievable by Act for Peace or its partners.

The authorised decision maker may refuse a donation where it is clear that:

- a) the activities of the supporter are directly opposed to Act for Peace’s purpose, policies (including policies prohibiting money laundering and the funding of terrorism) or against the best interest of Act for Peace’s beneficiaries; or
- b) the activities of the supporter are incompatible with Act for Peace’s purpose; or
- c) the cost (whether a direct, indirect or opportunity cost) to Act for Peace of accepting the donation will be greater than the value of the donation itself; or
- d) acceptance of the donation will directly lead to a net decline in the asset base of Act for Peace; or
- e) the offer of a donation is dependent upon the fulfilment of certain conditions by Act for Peace, where the conditions are: (i) contrary to the taxation status of Act for Peace regarding receipt of a donation (if any); (ii) in itself, contrary to Act for Peace’s purpose; (iii) in itself, contrary to the current policies or work priorities of Act for Peace; or requires Act for Peace to first spend its own money or resources.

The authorised decision maker must refuse a donation where there is a reasonable belief that the supporter is in vulnerable circumstances or lacks capacity to make a decision to donate.

The authorised decision maker must demonstrate that the evidence they used to form their decision to accept or refuse the donation relates to Act for Peace’s purpose and adheres to Act for Peace’s Code of Good Practice. Evidence must be provided where: a) it is not immediately clear what purpose the proposed donation would be used for; b) large sums of money or property are involved; c) there is reason to believe that the decision taken may expose Act for Peace to litigation; or d) there is the threat of negative publicity to Act for Peace by the refusal of a donation.

The authorised decision maker must not allow personal interests to affect their decision to accept or refuse a donation, and they must derive no personal material benefit from a donation to a cause for which they are working.

## 7.5. Receipts

Receipting and recording of donations

- Mail opening and payment receipt procedures should follow good internal control practices.
- Payments received through the mail should be recorded in a remittance advice register.
- Payments received electronically should be recorded in individual donor / grant management and ledger systems and should be reconciled on an appropriate basis, that is, daily, weekly, or monthly.
- Commonwealth funds provided by DFAT should be properly receipted and banked promptly.
- An appropriate audit trail of all receipts, including for donations, should be maintained.

A receipt should be sent to all supporters informing them of the details of their donation (unless the donation is anonymous, or the supporter’s contact details are missing). The receipt can be sent by email or mail and should include:

- (i) the date of the donation.
- (ii) the amount of the donation.
- (iii) the supporter’s name and contact details.
- (iv) Act for Peace’s Australian Business Number
- (v) the frequency of the donation.
- (vi) the payment method agreed by the supporter; and
- (vii) sequential numbering.

The receipt should be sent to the supporter as promptly as possible after the donation is received by Act for Peace.

## **7.6. Payment Card Industry Data Security Standards**

The Payment Card Industry (PCI) Data Security Standard (DSS) is a set of requirements designed to ensure that organisations that process, store or transmit credit card information maintain a secure environment in order to reduce credit card fraud. The requirements cover procedures, policies, networks, software design, architecture, and other security protective measures.

Act for Peace will maintain robust procedures to ensure compliance with the PCIDSS. Act for Peace will provide adequate training on these procedures to all relevant staff, contractors, and others where necessary, and enforce adherence to these procedures.

## **7.7. Outsourcing**

Act for Peace will have written contracts with all relevant parties in its Supply Chain that clearly specify the responsibilities of all parties and meet the requirements of applicable laws and regulations. Quotations should be obtained and documented for significant purchases where possible, and value-for-money principles should be followed.

Act for Peace will ensure that all relevant parties in their Supply Chain are aware of Act for Peace's obligations under the FIA Code and do not act in ways that could result in Act for Peace being in breach of the Code. Contractors will clearly identify themselves when communicating with donors or prospective donors, and Act for Peace is identified as the beneficiary of the funds.

Contractors will sign relevant compliance documentation, including but not limited to the Act for Peace Child Safeguarding Code of Conduct, Privacy Policy, and Confidentiality Agreement.

Act for Peace will ensure that Supplier costs incurred in fundraising are proportionate to the funds raised and represent fair market value for services provided

## **8. Advocacy and campaigns**

In addition to the requirements detailed in this policy, any Advocacy or Campaigning related marketing and communications activities undertaken by Act for Peace will comply with Act for Peace's Advocacy policy.

## **9. Compliance with this policy**

Compliance with Act for Peace's Marketing, Communications and Fundraising policy, and other policies relating to the accuracy, timeliness, and accessibility of information, will be enforced through:

- Staff and volunteer inductions, training and the mandatory signing of Act for Peace's Code of Conduct, and Child Safeguarding and Privacy Policy.
- Marketing & Communications checklists, which must be completed before communications are published.
- Performance management / disciplinary action taken against staff and volunteers should they fail to comply.

Compliance with Act for Peace's policies, including our Code of Conduct is a requirement and any staff or volunteers found to have breached these policies will be subject to appropriate performance management or disciplinary procedures, including suspension and dismissal.

## **Annex 1. Resource and Reference List**

- Fundraising Institute Australia  
<https://fia.org.au/fiacode/>  
<https://fia.org.au/fia-code-course-practice-notes/>
- Australian Council for International Development  
<https://acfid.asn.au/content/read-code>
- The Australian Charities and Not-for-profits Commission (ACNC)  
<http://www.acnc.gov.au/>
- Australian Competition & Consumer Commission  
<https://www.accc.gov.au/>
- The PCI Security Standards Council  
<https://www.pcisecuritystandards.org/>
- The Office of the Australian Information Commissioner (OAIC)  
<https://www.oaic.gov.au/>
- Federal, State and Territory Resources and References  
<https://fia.org.au/fiacode/government-links/>